

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BENJAMIN GEORGE,)	
)	
Plaintiff,)	Case No. 20 CV 6911
v.)	
)	
CITY OF CHICAGO, JAMES GARDINER)		Judge: Honorable Robert Blakey
CHARLES SIKANICH, CHICAGO)		
POLICE OFFICERS SOLOMON ING,)		Magistrate Judge: Honorable Beth Jantz
PETER PALKA, DANIEL SMITH, BILOS,)		
JOSEPH FERRARA, SERGIO CORONA,)		
ORTIZ, AND UNKNOWN CHICAGO)		
POLICE OFFICERS)		
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO
FILE REPLY IN SUPPORT OF THEIR MOTION TO DISMISS (ECF No. 40)**

Defendants Ing and Corona, by and through one of their attorneys, Nicholas Perrone; Defendants Palka, Smith, Ferrera, and Bilos, (hereinafter “Defendant Officers”) by and through one of their attorneys, Emily R. Bammel; and Defendant City of Chicago (hereinafter “Defendant City), by and through Celia Meza, Acting Corporation Counsel for the City of Chicago, (collectively “Defendants”), request that this Court extend the time for them to their Reply in further support of their Motion to dismiss Plaintiff’s Amended Complaint to May 21, 2021. In support of its motion, defendants state as follows:

1. On March 12, 2021, Plaintiff filed his first amended complaint against defendants. (ECF No. 37.)
2. On April 1, 2021, defendants filed a motion to dismiss Plaintiff’s first amended complaint (See ECF No. 40.).

3. On April 5, 2021, this Court set a briefing schedule on Defendant's motion to dismiss. Plaintiff's response was due April 30, 2021 and Defendants' reply is due May 14, 2021.

4. Defendants are requesting a 1-week extension of time, to and including May 21, 2021, to complete their reply.

5. This is Defendants' first request for an extension of time relating to motion practice. This request is not made for dilatory purposes, and Plaintiff will not suffer any prejudice by granting the extension.

6. Undersigned counsel has contacted Plaintiff's lead counsel, Daniel Massoglia, who agreed to this motion.

WHEREFORE, Defendants respectfully request that this Court extend the time for them to file their reply to and including May 21, 2021 and grant such further relief the Court finds reasonable and just.

Dated: May 12, 2021

Respectfully submitted,

/s/ Nicholas Perrone
Nicholas Perrone
Assistant Corporation Counsel
On behalf of Defendants Corona and Ing

/s/Emily R. Bammel
Emily R. Bammel
Assistant Corporation Counsel
On behalf of Defendants Palka, Smith, Bilos, and Ferrara

CELIA MEZA
Acting Corporation Counsel for the City of Chicago

BY: /s/Joi Kamper
Assistant Corporation Counsel Supervisor
On behalf of Defendant City of Chicago

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Attorneys for Defendant City of Chicago

CERTIFICATE OF SERVICE

I hereby certify that on May 12, 2021, I served a copy of **DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF THEIR MOTION TO DISMISS** upon all parties via their attorneys of record by causing it to be filed by the CM/ECF system.

/s/Nicholas J. Perrone